### Chima & Ibrahim

Advocates Corporate Counsel

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March 24, 2008

The Honorable Robert P. Peterson United States District Judge United States Courthouse 500 Pearl Street New York, New York 10007 USA

#### Re. United States v. Hafiz Zubair Naseem, 03 CR 610 (RMB)

- 1. I am a practicing corporate lawyer in Pakistan, with twenty years standing in the profession. A brief resume of my firm is attached as <u>Annex A</u>.
- 2. One significant area of practice for our firm is banking. It is in this capacity that I got to know Hafiz Zubair Naseem. Though I did not have any direct professional interaction with him, my firm advised and interacted with some of his colleagues in transactions in which American Express Bank Limited ("Amex") was participating. However, my interaction with Hafiz himself was largely of social nature.
- 3. Soon we found ourselves playing golf together which worldwide and in Pakistan as well is a significant bonding exercise. I feel I got to know Hafiz better through such interaction.
- 4. I always enjoyed interacting with him. He was unique in that having memorized the Quran by heart, he still was not dogmatic about religion indeed had a very liberal outlook on life. For instance, while most Quranic scholars are of the view that interest is forbidden by Quran, Hafiz had an entirely different and more rational approach on the issue.
- 5. In the ten years or so that I have known Hafiz, I did not get to interact with his family but sensed that he was fully devoted to his family. Since the commencement of the proceedings against him, I have interacted with his father and brother and can say first hand that they are both totally devastated.
- 6. I sensed as well that Hafiz was very highly regarded by his colleagues. He also appeared to be someone who would go out of his way to help others.
- 7. I know in particular that he was greatly affected by his daughter's condition of cerebral palsy. I cannot begin to imagine how tormented he must be to find himself so helpless (in the current circumstances) to do

anything to help his daughter's condition. The thought that Maheen's treatment may be delayed (or worse, abandoned) must be devastating.

- 8. I recall that his daughter's condition was one significant factor in him choosing to go the United States to pursue further studies (though he was also of course interested in enhancing his personal abilities).
- 9. During his stay in the USA, I referred some acquaintances to him for guidance, and always got a very positive feedback that he had been most helpful in guiding them.
- 10. Needless to add, I am personally distressed to learn about his current situation. I would appeal for a compassionate sentence for him, on account (inter alia) of the following factors:
  - i. His suffering over the past several months and that of his family (during the proceedings) has been immense and cannot really be described in words.
  - ii. His family looks to him to provide support in a number of matters, considering that his daughter suffers from cerebral palsy, his father is a heart patient, and his mother an epileptic for the past 38 years. The plight of his family is unimaginable to me, particularly if Hafiz were to be given any kind of extended sentence.
  - iii. His wife (a housewife) and son (10 years of age) are also of course fully dependent on him. Indeed my heart goes out to them (and the rest of his family) in these trying circumstances considering that they have all lost the love and affection that Hafiz Zubair would be able to give them.
  - iv. I am personally aware that all his friends are also deeply affected by the proceedings and are hoping for a lenient sentence.
  - v. I am also personally aware of Hafiz Zubair's character, and would vouch for the fact that he does not deserve anything but the most lenient sentence possible under law. Indeed, he is deserving of compassion on account of his friendly dispensation and caring attitude towards others.
  - vi. He was very much a role model for others on account of being a hardworking and intelligent professional. A number of his well wishers and admirers would be shattered by a hard sentence.
  - vii. Hafiz Zubair has already suffered immensely by seeing how devastated his family and friends are and it would be in the interest of justice to award him as soft and lenient a sentence as possible under law.
  - viii. The fact that he has lost not only his job but also his future career also recommends a lenient sentence.

All told I do hope and appeal for a compassionate sentence for Hafiz Zubair, and wish him the best in these trying circumstances.

Salman K. Chima

#### CHIMA & IBRAHIM

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FIRM PROFILE: Established in 1990, Chima & Ibrahim specialises in advising multinational corporate clients.

#### **PARTNERS**

KHALID S. IBRAHIM, born April 1, 1961; Barrister-at-Law, Lincoln's Inn (1986); Advocate High Court, Pakistan (1986). Education: Harvard University, U.S.A. (B.A. Hons., 1983); Queens' College, Cambridge University, England (LL.M, 1985). E-mail: khalid.ibrahim@chima-ibrahim.com

SALMAN K. CHIMA, born June 10, 1963; Barrister-at-Law, Lincoln's Inn (1987); Advocate High Court, Pakistan (1987). Education: Harvard University, U.S.A. (B.A. Hons., 1984); Downing College, Cambridge University, England (B.A. Hons, 1986); University College, Oxford University, England (B.C.L., 1987). E-mail: salman.chima@chima-ibrahim.com

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REPRESENTATIVE CLIENTS: ABN AMRO Bank N.V., Cargill Financial Services Asia Pte Ltd, Citibank N.A., Crescent Petroleum Company International Ltd., Dana Gas PJSC, Engro Polymer and Chemicals Limited, Ericsson AB, Faysal Bank Limited, Limitless LLC (a Dubai World affiliate), JP Morgan, Nestle Pakistan Limited, Occidental Petroleum Inc., Pakistan Mobile Communications Limited, Pepsi Cola International (Pvt) Ltd., Petronas, Philip Morris Asia Limited, Schlumberger Seaco Inc., SONY Pakistan (Pvt) Limited, Thales Airsys ATM, TOTAL Parco Pakistan Limited, Toyota Motor Company, Yamaha Motor Company.

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The Honorable Robert P. Patterson United States District Judge United States Courthouse 500 Pearl Street New York, NY 10007

Re: United States vs. Hafiz Zubair Naseem 03, CR, 610 (RMB)

Honorable Justice Patterson,

It is with deep sadness and concern for the well-being of a personal and professional friend and his family that I write to seek your understanding and kindness in the matter of Hafiz Zubair Naseem. By way of introduction, my company is Pakistan's leading purveyor of traditional sweets and thanks to ideas and help from professionals like Zubair we have become the first Pakistani multinational in this area.

I have known Hafiz Zubair for more than 10 years now and our circle of personal and professional contacts includes many common individuals and companies. I have never had the occasion to doubt Hafiz's honesty and sense of commitment, not only to his employers (which included a major US bank in Pakistan) but more important, to his family, specially to his little girl who is a symbol of the great suffering, but also the great hope the Naseem family has lived with these past few years. Indeed, knowing Zubair I can say that his daughter's health and progress towards a normal fun-filled childhood would be the greatest achievement in Zubair's life. Clearly, this is only possible if her father is around to provide not only financially for her but more important, give her the emotional support she needs as she grapples with her affliction

I seek your kind understanding to give a shattered family a chance to reach out to life again; I may add that for Pakistani families such as Zubair's the father figure is much more than important. Indeed he is the very foundation on which such families depend for their survival.

With kind regards

Faisal Faroog

Chief Executive and Chairman of the Board The Nirala Group of Companies Lahore, Pakistan



BRUNO M. PONTERIO RIDGE STREET SCHOOL 390 NORTH RIDGE STREET RYE BROOK, NEW YORK 10573-1105 (914) 937-3600 FAX (914) 937-1265

KEVIN A. FITTINGHOFF PRINCIPAL

BLIND BROOK - RYE UNION FREE SCHOOL DISTRICT March 31, 2008

To Whom It May Concern,

I am writing on behalf of two children, Maheen Nasim (age 7) and her brother Danish Nasim (age 10).

Both children are currently students at Ridge Street Elementary School in Rye Brook, NY. Maheen is in the second grade and Danish is a fifth grader.

While I am sure that many letters cross your desk expressing the hardship a prison term would bring upon a family, it is my hope that you give this cause consideration.

The Nasim's daughter, Maheen, suffers from cerebral palsy. She is confined to using crutches to move around the school. In my twenty years as a professional educator I have never seen a child as determined and motivated as Maheen. She is a bright, happy and friendly child. This is due in large part to the attention and support Maheen receives in school.

Our school is uniquely qualified to work with Maheen. Through a Section 504 accommodation plan, Maheen receives a full time, one-to-one aide as well as adapted physical education, occupational therapy and physical therapy. All of these services are delivered on – site in our own purpose built therapy room.

If Maheen's father is confined to prison and is unable to support his family, I have a great fear that Maheen, her brother Danish and her Mother will no longer be able to afford to stay within our school's district.

If the Nasim's are forced to leave Ridge Street, Maheen will have to wait months to receive, what will in all likelihood be inferior services. I have worked in numerous school districts and have seen how, while the services are "legally" met they are not in the spirit of really helping the child. Often times multiple aides are used to service a child, occupational and physical therapy are delivered in hallways without the proper equipment. The contact hours between the service provider and child are drastically reduced. This could have a life long impact on Maheen. In the worst case scenario, if the Nasim's would be forced to return to their native country where these services are not even provided making her furthered education doubtful.

Anything that would interrupt Maheen's current educational surroundings would be a travesty for an innocent child who only knows that she is loved and cared for with great affection at her current school.

Danish will also be deeply affected. Danish is a very conscientious and hard working student. His desire to succeed in school is unparalleled. Due to the publicity surrounding his father's legal issues, Danish has withdrawn from his peers. With his father away from the home it is my fear that Danish will continue to isolate himself and his self-esteem will be forever damaged. A son needs his father and Danish is no exception.

Please bear in mind the ramifications that will occur to Maheen in the event her father is sentenced to prison.

Please feel free to contact me if I can provide any further information.



#### NEW YORK UNIVERSITY SCHOOL OF MEDICINE

Joan T. Gold, M.D. Clinical Director of Children's Rehabilitation Services Rusk Institute of Rehabilitation Medicine

400 East 34th Street New York, NY 10016-4998 Telephone: (212) 263-6519 Facsimile: (212) 263-7794

February 8th, 2008

RE: MAHEEN NASEEM

D.O.B.: 08/21/00

To Whom It May Concern:

The above-named patient is a 7-year-old female with spastic diplegic cerebral palsy who has been under my care for the past 3-4 years. She has undergone a selective dorsal rhizotomy procedure, which is an extensive neurosurgical procedure on her back in order to modulate the abnormal tone in her lower extremities. She is still in need of extensive lower extremity release surgery and possibly boney intervention.

She has been fully evaluated at this Medical Center and at the Hospital for Joint Diseases.

It would be imperative for her continuity of care purposes that her surgery be performed and that she receive post-operative rehabilitation at this facility.

She needs the input of her parents in order to emotionally cope with said interventions.

I can be reached at 212-263-6519 should you require any additional supportive information. Thank you.

Yours truly

Joan T. Gold, M.D.

JTG:lp

Re: United States v. Hafiz Zubair Naseem, 03 CR 610 (RMB)

My name is Aroona Hashmi. I am an academic currently with Punjab University (I.E.R) and a PhD scholar. I am Hafiz Naseem's cousin cum elder sister. I know him since my childhood. Our relation is such that he has shared all his achievements with me. He never faced defeat because he is such a diligent, brilliant &honest man that God gave him all that he toiled for.

Hafiz Naseem is a simple person who has respect for others and the trademark personality behaviors are humbleness and kindness, truthfulness and helpfulness to the society. He used to come to our home and discuss at length issues regarding his studies and future with my late father. He is the most educated and hard working man in our family knowledge. He is a contented person with the achievements in his life.

My father's death was devastating for me. He was a mere 10 grader student but supported me emotionally and helped me get over the great loss. I am thankful to him. As a student he got many Scholarships. Throughout his academic career he never beguiled anyone. He was industrious and that was his key to success. My husband and Hafiz Naseem shared the same university. They often talked about their university.

Your honor, my relation to his parents is like a daughter, to his siblings like an elder sister. His mother is a chronic patient.

I felt the pain with Hafiz Naseem and his family when ever his mother was in hospital or when she faced health issue. It was the biggest blow for Hafiz Naseem when Mahnoor, his teenage sister died. I still remember he told me in hospital that he is worried about you and mother. He never mentioned his own grief but always tried to help others.

His father though a heart patient is like a tree whose shadows always protected me. I have a daughter father relation with him. Hafiz Naseem supports me emotionally in my ups and downs of life and encouraged me to start my PhD. He is a very loving and caring father for his children.

Hafiz Naseem's wife Ayesha was my selection. She is the perfect wife for him. She is the best sister-in-law and the best aunt for my children. Hafiz Naseem and Ayesha together are loving and hospitable couple. She is warmhearted person. She is a simple house wife whose world starts and ends with Hafiz Naseem and her children.

Hafiz Naseem's son Danish is my son's best friend in Pakistan. Danish is a nice and loving boy who constantly needs his dad and mom. His daughter Maheen is a cerebral palsy patient. Hafiz Naseem went to America only for his daughter's treatment. Her treatment has suffered because of the situation. Not only his daughter but his parents, brother & friends are suffering.

Your honor, his mother is already distressed with the death of her daughter and has not yet over come the loss. She cries miserably now. I can't see her condition. She needs her husband and sons to support her and comfort her. She is in no state to suffer more. She shares her heart out with me. She just needs her son in her arms. The lively Ayesha has changed in last one year of stress. She is serious and in distress. She has become diabetic. She needs the man of her life back. Her children are suffering; Maheen is suffering emotionally as well as physically. Danish has lost his laughter. His brother is heart broken. He was always smiling but now he is worried. A beautiful family is on the verge of collapse. I can write more and more but no words can express the pain I am suffering. His relation with me is beyond words. I beg you for mercy on my brother and family. He is a gem for his family. They have suffered enough, save their beautiful family. I appeal to your sense of compassion and kindness to weigh the sheer size of the situation for his family and act with all the prudence and kindness possible. I request you to consider his current period as a penalty in itself and give him a chance to once again start all over for himself and his family. It is my prayer to Almighty to bestow His mercy on Hafiz Naseem and his family.

Thank you for your kind consideration.

Aroona Hashmi

The Honorable Robert P. Patterson

**United States District Judge** 

**United States Courthouse** 

500 Pearl Street

New York, New York 10007

Sub: United States v. Hafiz Zubair Naseem, 03 CR 610 (RMB)

Your Honor,

Let me introduce myself in the context of a heart rendering matter that requires your kind and prudent consideration on humanitarian grounds. My name is Prof. Muhammad Jamil. I have been the faculty member of Govt. College University Lahore. I am running my own educational institutes Jamil Academy, Jamil Academy School system and Jamil Model Degree College Lahore in order to motivate, inspire, encourage and enlighten the minds and spirits of our youth. Being enlightened follower of our beloved Last Prophet of Allah Hazrat Muhammad (SAW), I yearn to inculcate moral and Islamic values, optimism and better prospects of future among our students.

I have been in close contact with my students as well as their parents. It is in this context that I write about one such student of mine Hafiz Muhammad Zubair Nasim, currently of Rye Brook, New York, and charged in an insider trading case, which has been heard in Your Honour's court.

I have close relations not only with Hafiz Nasim but also with his parents. I have been in contact with the pitiable mother of his for twenty years (since 1985). She is just like my sister. She is a patient of epilepsy. She used to come to me concerning her children's bright future as is the wish of all parents. Hafiz Nasim had been my student in F.Sc in Jamil Academy. He is a capable, hard working, talented, optimistic, sincere, devoted, innocent and courteous young man. His sister Mahnoor had also been my student in F.Sc. Unfortunately, she died when she was 19.

Hafiz Nasim is married with 2 kids, one daughter physically challenged by birth and one son Danish 10 years old. He went to America for his daughter's medical care and to enhance his capabilities.

Unfortunately, the vexing news was conveyed to me that my brilliant student has been put behind bars, he is already facing mental anguish due to aged mother's illness and daughter's problem. His mother is already worried due to the untimely death of her only teen aged daughter, Mahnoor. Hearing the news of her son's long imprisonment will be too much of a burden for her.

We are all hoping for a better future for this extraordinary man. I appeal to Your Honor to have mercy on Hafiz Nasim and consider this matter sympathetically. Please have consideration for this already unfortunate family and be as lenient as possible in your sentencing. We will all be highly obliged.

Prof.Muhammad Jamil

Af chaeron James!

Rehman Arcade, Near Civil Secretariat.

Lower Mall, Lahore, Pakistan.'

Date March 24, 2008

The Honorable Robert P. Peterson

United States District Judge

**United States Courthouse** 

500 Pearl Street

New York, New York 10007

Re: United States v Hafiz Zubair Naseem, 03 CR 610 (RMB)

I am a banker by profession and have over 24 years of international banking experience primarily with American Banks. I am presently based in Istanbul , Turkey and am working in the capacity of Senior Management for a Multilateral Development Bank, namely ECO Trade and Development Bank.

I got to know Zubair as a colleague in the year 2000, though for a very short while as he subsequently moved to USA for his studies. To the best of my knowledge and as per information available to me he was hard working and very devoted to his work. I found him as a nice person who would help others and give due respect to them. We have at times played golf together and his behavior reflected of a gentleman.

In the process I got to know his family and found Zubair an extremely caring individual. He was always very concerned on account of his daughter's health, who is suffering from cerebral palsy. He must be very concerned about her treatment and to my recollection it was an important factor for him to choose USA.

Zubair appeared to me a liberal person, who would like to have a balanced approach to life and desired to excel in his field by pursuing quality education.

I would appeal for a compassionate sentence for him for the following reasons:

He is the main support for his immediate family. He has a daughter who needs special medical attention. His mother and father are quite aged and are suffering from epileptic and heart problems respectively. Zubair has suffered over these months considerably and an extended sentence would shatter not only him but his whole family who are morally and financially dependent on him.

I request to consider a compassionate sentence for Zubair, and wish him best under these circumstances.

Nadeem Karamat

# Case 1:07-cr-00610-RPP Cocument 74 Filed 05/23/2008 Page 12 of 21 FORMAN CHRISTIAN COLLEGE

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Honorable Judge Robert P. Patterson US District Judge US Courthouse 500 Pearl Street, New York.

March 12, 2008

Respected Judge Patterson,

We write to seek your understanding and compassion in the case of Hafiz Zubair Naseem that is to be heard by you.

We have all had the pleasure of teaching and knowing Hafiz Naseem as our student in the top rated MBA program in Pakistan. He began with promise but was soon affected deeply by the death of his young sister. He kept his remarkable commitment to his education and to becoming a well-liked and w ell-respected member of his graduating class, the Class of 1997. We were all proud of his superior career progress at the leading bank where he worked and wished him well as he proceeded to the USA to seek higher education and the medical care that was so vital for his daughter to be able to walk.

We are all deeply pained and stunned by the dramatic tragic turn in his life and cannot but pray for his honorable exoneration so that he may once again guide his family through dint of his hardwork and honest living that we all know he so cherished.

As his former professors we all ask for your understanding to give Hafiz Naseem and his family, who are so utterly dependent on him in every way, a fair chance to again become normal, productive, and hopeful members of society.

With best regards.

Very truly yours,

Professor Bashir A.Khan Ph.d

Adellin alle

Professor and Dean, Zafar Qureshi Ph.d

Professor Wasif M.Khan



#### LAHORE UNIVERSITY OF MANAGEMENT SCIENCES

Suleman Dawood School of Business

02 April 2008

The Honorable Robert P. Patterson United States District Judge United States Courthouse 500 Pearl Street New York, New York 10007

Re: United States V Hafiz Naseem, 03 CR 610 (RMB)

We are the faculty of Suleman Dawood School of Business (SDSB) at the Lahore University of Management Sciences (LUMS), Pakistan. LUMS is considered one of the best Business School of Pakistan and is responsible for turning out more than thirteen hundred MBA's since 1988. These MBA's are amongst the most successful business managers in almost every business area of Pakistan at this time and are known for deep grounding for ethical values. LUMS is not just a business school but is a family which provides guidance and keep close contact with its students. It is therefore very distressing to see that one of our students was involved in the above mentioned case. Knowing Hafiz quite well, we would like to share our experience of him during the two years he was at LUMS.

Hafiz Naseem entered our MBA program in 1995 after having earned a B.Sc. in Engineering. He immediately made his mark on account of mainly two things. One was his performance as a student and other was his natural respect for his professors. He was always very keen on learning the new concepts and used to frequently seek help from his professors. After his graduation, he kept in touch with us and occasionally dropped in to seek career advice.

During the two years on campus interaction, he showed high level of maturity and behaved as a very responsible professional. We believe that this unfortunate incident may have been a rare serious lack of judgment over his part because it really does not fit with the experience we have had with him during the last 12 years. We are also familiar with hardship that his family faces. His daughter is suffering from Cerebral Palsy, both of his parents are seriously ill and Hafiz is the only bread earner of his family. Your Honor, we appeal purely on humanitarian grounds to give him a chance to once again become a responsible citizen, father, son, and husband.

We appeal for compassion and kindness in his case..

Sincerely,

Dr. Jamshed H. Khan

Associate Dean

Tel # 92 42 5727612

Email: Jamshed@lums.edu.pk

## Calc 107 cr 00610 RPP Chocument 74 Filed 05/23/2008 Page 14 of 21

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The Honorable Robert P. Patterson United States District Judge United States Courthouse 500 Pearl Street New York, NY 10007

March 10, 2008

Your Honor,

Allow me to introduce myself in the context of a rather distressing matter that awaits Your Honor. My name is Professor Wasif M. Khan and I am an academic currently with the Forman Christian College, Lahore. Prior to this I was among the start-up faculty of the Graduate Business school at the Lahore University of Management Sciences, Pakistan's foremost business school. During my teaching tenure at the business school I have taught nearly 1000 graduate students and am thankful to God that I have been close to many of them and guided them through their professional careers. It is in this context that I write about one such student of mine Hafiz Zubair Naseem, currently of Rye Brook, New York, and charged in an insider trading case, which has been heard in Your Honour's court.

Hafiz Zubair Naseem came to the business school in 1995 with the hopes and aspirations of any typical student; to acquire capabilities that would allow him a better professional opportunity than his current engineering degree would. He was a steady, conscientious student who often heard me telling him that he should try to excel and me at the top of the class, something he heard obediently and with all the respect that a teacher's advice deserved. Sadly, shortly after the start of his MBA, he suffered a catastrophic tragedy in the death of his teenaged sister; no words can quite capture the family's state and when I saw his mother last year, it was clear that she had never recovered from this colossal loss. Hafiz Naseem spent two years with us at the business school and became known for his kindness and helpfulness to one and all. Even after graduating, he was in close contact with me always seeking my counsel on career issues. He hardly needed such counsel because all signs pointed to his excelling at his work and comments I heard from superiors and peers always seemed to be highly commendable.

Following his urge to excel he later enrolled at the Stern School of Business and during my visits to New York he would make it a point to welcome me with his typically warm hospitality and update me on the challenges and opportunities the USA offered. More than his excitement at these, I will always cherish his warmth and kindness and the optimism with which he would describe the long and arduous treatment his young daughter was undergoing and which was one of the essential purposes for his going to the US. He was so thankful to God and to the medical facilities in the US that would give his

daughter the chance to walk normally. Spending time with his family during my New York visits only confirmed the hope and optimism the family had for the little daughter.

It was thus with a great sense of shock that I first learned that he may be in some trouble with the law. We kept in touch through the trying times and I urged him to trust God and his innocence and face the times with patience, courage and hope. Sadly for all of us who know Hafiz Naseem, the jury verdict dashed not only our hopes but also smashed the hopes and the future of a family that has seen more tragedy and pain than what many of us can imagine in a lifetime. Meeting his old parents, it is hard for me to control tears but he always cautions me to give them courage and hope.

Your Honor will undoubtedly be aware of the extremely distressing situation his family is in. I for one cannot imagine the sheer emotional mayhem and destruction that will be caused by his prolonged absence from two aging parents and a wife and two extremely attached and dependent children. I do not understand what led to the horrible situation in which he, and more than him, his family finds itself in today, I can only think of the innocent, friendly and helpful young man who came to my first class on 1995 and the professional in the US who seemed to keep his old fashioned values alive and available for his friends and teachers.

I appeal to your sense of compassion and kindness to weigh the enormity of the situation for his family and act with all the prudence and kindness possible.

Very truly yours,

Wasif M. Khan

Professor,

School of Management

Forman Christian College, Lahore.

Ding willhow

Pakistan

Re: United States v. Hafiz Naseem, 03 CR 610 (RMB)

My name is Mrs. Amna Khurram and I am wife of Hafiz Naseem's friend Khurram Javed Maqbool. I know Hafiz and his family since I got engaged to my husband, now for about more than fifteen years. His mother was like my own senior family members and his late sister Mahnoor was a good friend and like younger sister. Later on when Hafiz got married to Ayesha, I became close friend of her and we used to spend lot of time together. Hafiz and my husband are not only very close friends but they were also class fellows at the student stage and I clearly remember Hafiz as a very nice, simple, humble, respectful and helpful person.

I know Hafiz as a very responsible son, a loving husband and a devoting father. He used to take lot of care of his parents and was very concerned that no ill was caused to them because of him. His wife always used to cherish her relationship with her husband and claimed herself one of the luckiest women in the World.

When he left Pakistan, we asked Hafiz why he was going and his response was that only because of his daughter. His daughter, Maheen, needed special therapies and also required series of surgeries in order to completely heal from her illness of cerebral palsy. Last year when Hafiz and his family visited Pakistan, I was extremely happy to see that Maheen had improved a lot and this was only possible in United States and due to hundred percent devotion and care from her parents.

But now due to the events of last one year, everyone of Hafiz's family is suffering. The health of his parents is declining and treatment of his daughter has stopped before completion. In just one year, a beautiful family has gone down the edge.

The suffering through which Hafiz has gone through in last one year is not just for him, it includes suffering of his parents, wife, children, brother and friends also. Therefore, Your Honor, I request you to consider his current period as a penalty in itself and give him a chance to once again start all over for himself and his family. It is my prayer to Almighty to bestow His mercy on Hafiz and his family.

Thank you for your kind consideration.

Amna Khurram

### Re: <u>United States v. Hafiz Zubair Naseem, 03 CR 610 (RMB)</u>

Respected Judge Patterson,

I write to seek understanding and compassion in the case of Hafiz Zubair Naseem which is to be heard by you. I have known Hafiz Naseem since as far back as I can remember. We have been together since infancy since his parents and my parents were good friends. I've always felt that he is like a younger brother to me regardless of the fact that we aren't related by blood. Apart from my own immediate family, he is the closest person to me.

As mentioned earlier, we have been together since childhood; therefore, we have faced all ups and downs of our life together. When my father passed away while I had just left school and joined college, he was right besides me to will me on and stayed with me through our time in the University of Engineering and Technology in Lahore from where we both got our Engineering degrees. If it weren't for him, I would not have been able to resume my studies. The love and support he gave to me was nothing compared to the care he put towards his parents. His mother is epileptic and he was always with her through all her ill phases taking care of her every need. His father is a heart patient; therefore, he always tried his best to handle the pressures on his family himself and not put too much responsibility on his father. When his sister passed away in her teens around 12 years back, he stood by his father and didn't let him crumble from the loss of his only daughter. Hafiz Naseem put his own sorrow behind him to take care of his father and mother through these tough phases. When Hafiz Naseem's daughter was born with Cerebral Palsy, he was devastated. He had already lost his sister whom he loved so much; he couldn't bear to witness the pain he saw his daughter going through. He vowed to do everything possible to make sure that his daughter got normal as soon as possible. He decided to move to the land of opportunities because they had the best facilities available to treat his daughter. He is very attached to his daughter as well as his son and his wife and his parents and his brother and I am very much attached to the person who has always been with me through thick and thin.

Therefore I appeal to you, please do not give him any more punishment than he has already gone through in the last year. So many lives in this world depend on his support and guidance. It is in your hands to save so many people from going through even more torment then they have already seen in their life. Please, allow him the maximum possible leniency in sentence.

Ahmen Malik

Ahmer Malik 26 – LARECHS Bridge Colony, Lahore, Cantt.

## Re: <u>United States v. Hafiz Zubair Naseem, 03 CR 610 (RMB)</u> Respected Judge Patterson,

I am seeking understanding and compassion in the case of Hafiz Zubair Naseem which is to be heard by you.

I have known Hafiz Naseem since that past 9 years when his younger brother got married to my elder sister. Although Hafiz Naseem was friends with our family before the above mentioned wedding, my interaction with him began after the wedding.

When the wedding took place, Hafiz Naseem and his family were still trying to get over the loss of his sister who had passed away about 3 years earlier. I found that Hafiz Naseem was the pillar to the fallen family and it was mainly due to his efforts that his mother (who suffers from epilepsy) and his father (who has a severe heart condition) recovered from the shock of loosing a daughter. Amongst all this grief and sorrow arose a man with great respect for life and care for others. I remember one particular encounter with him when I was doing my GCE O' Levels. I am currently doing my bachelors from the Lahore University of Management Sciences (LUMS), the top institute in Pakistan, and I owe full credit to Hafiz Naseem in helping me become a part of this honorable institute. I hadn't made future plans yet while I was in O' Levels and upon finding this out, Hafiz Naseem gave me his full support and guidance through my academic years and it was because of his guidance that I am currently a student of such a well respected university. He moved to the United States some while back for the treatment of his daughter Maheen who suffers from Cerebral Palsy by birth. He physically left the people he loved so dearly back home so that his daughter could get the adequate treatment which was unavailable in Pakistan at that time, yet he was emotionally always with his family back home willing them on and supporting them in any way that he could.

Your Honor, this is a plea from me to you not to remove Hafiz Naseem from the community. A fatal blow will be struck in the hearts of countless people, his parents who will have to bear the torment of loosing another child and to witness the pillar to their family crumble before their eyes, his wife and children who will no longer have him to provide the love only a husband and father can provide and people like me, who look at the beacon of his individual being to guide us through our academics. I have full faith in your Justice System and I hope that you will consider giving him the most lenient of punishments so that the lives of these countless people are not devastated by his removal from amongst them.

Fahad Malik 10020050@lums.edu.pk

#### Re: United States v. Hafiz Zubair Naseem, 03 CR 610 (RMB) Respected Judge Patterson.

I am writing for compassion in the case of Hafiz Zubair Naseem. I have known Hafiz Naseem since he was a little boy playing in my parent's house with my younger brother. We always had good family relations with the Naseem's because Hafiz Naseem's father and my father were good friends working together in Pakistan Railways.

Hafiz Naseem had a distorted childhood since his mother Mrs. Parveen Naseem is epileptic and he had to endure her condition when she would go into her epileptic fits. But the boy was always strong willed and from a young age began taking care of his mother always helping her out in her daily chores and keeping track of her medications. I was very impressed that such a young child can be so caring towards his mother. This nature carried forward in him through time and his care and love for his mother and father was at its peek at the time when Hafiz Naseem's younger sister passed away in her teens. The way he supported his mother through the rough times and the way he took care of his father who had lost his footing in such a tough time was very impressive and mature for his age. This love and care descended from his parents to his daughter when she was born with Cerebral Palsy. He showed the same concerns and the same care towards his daughter which he portrayed while taking care of his mother. Consequently he was forced to move to America so that his daughter could be properly taken care of. He is the biggest support morally as well as financially towards his parents as well as his own family. I was so impressed by Hafiz Naseem that I married my own daughter to his younger brother Usman Naseem just on the fact that Usman was Hafiz Naseem's brother.

Therefore, this is my plea to you not to give him a sentence since his family has already suffered a lot in this past year or so since this whole case has developed. His mother's condition is worsening day by day. His daughter does not have her father by her side to help her through the tough times of her treatment. These two people, as well as his father who is a heart patient, are closely linked with Hafiz Naseem's individual being and if Hafiz Naseem is dealt with harshly, I'm afraid the two most important women in his life would not be able to sustain the torture of not being able to talk to him everyday and to see his face. This is my plea to you to have mercy on Hafiz Naseem as well as his family which cannot survive without him.

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Filed 05/23/2008 Page 20 of 21

Case 1:07-cr-00610-RPP Document 74
The Honorable Robert P. Patterson
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

#### Re: United States v. Hafiz Zubair Naseem, 03 CR 610 (RMB)

Respected Judge Patterson,

I am Saad Mushtaq Malik, working as Executive Director Marketing with one of the leading National Pharmaceutical Company of Pakistan since last 23 years.

I am writing this letter in order to provide understanding and seek compassion for Hafiz Zubair Naseem. Hafiz Naseem is one of the two living sons of Mr. Muhammad Naseem and Mrs. Parveen. He is known to me since last about thirty years, since he was a little boy playing in my in laws house with my younger brother in law. We always had good family relations with the Naseem's because Hafiz Naseem's father and my father in law were good friends working together in Pakistan Railways.

Hafiz Naseem had a very unusual and troubled childhood since his mother Mrs. Parveen Naseem is epileptic and he had to endure her condition when she would go into her epileptic fits. But the boy was always strong willed and from his early days he started looking after his mother, helping her out in her daily households and keeping track of her medications. I was very much impressed that such a young child can be so caring towards his mother. This nature carried forward in him through time and his care and love for his mother and father grew at the time when Hafiz Naseem's younger sister passed away in her teens. The way he supported his mother and father through these emotionally trying times was very impressive and mature for his age.

His father who is now retired from Pakistan Railways is a cardiac patient and is not in a position to properly look after himself and his family. Hafiz Naseem has to provide moral support to his family.

He showed the same concern and care towards his daughter which he portrayed while taking care of his mother when she was born with cerebral palsy. In Pakistan he tried his utmost to provide the best available medical treatment, but the physical and mental position of his daughter did not improve much. Subsequently he decided to move to America so that his daughter could be provided better medical treatment. He is the biggest support morally as well as financially towards his parents as well as his own family. I was so impressed by him that I married my own daughter to his younger brother Usman just because of the fact that Usman was Hafiz Naseem's brother.

I am therefore, making my humble plea to you that he should not be given any sentence as his family has already suffered a lot during the past year or so since start of this whole case. Both his mother's and father's condition has since worsened and would continue to do so if this situation continues. His daughter does not have her father by her side to help her through tough times of her treatment. These three people are closely linked with Hafiz Naseem's individual being and if Hafiz Naseem is dealt with harshly, I'm afraid the torture of not being able to talk to him and see his face will be too much for them to endure. I would once again reiterate to request you to have mercy on Hafiz Naseem as well as his family which cannot survive without him.

Saad Mushtaq Malik

saadmalik@schazoo-spl.com

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The Honorable Robert P Patterson United States District Judge

The Honorable Robert P Patterson Filed 05/23/2008 Page 21 of 21 United States District Judge

United States District Judge United States Courthouse 500 Pearl Street

New York, New York 10007

Re: United States v. Hafiz Zubair Naseem, 03 CR 610 (RMB)

Respected Judge Patterson,

I write to seek understanding and compassion in the case of Hafiz Zubair Naseem which is to be heard by you.

I have known Hafiz Naseem since our childhood. His father and mine worked together in the Pakistan Railways and he comes from a very respectable family of Lahore. I got married to Hafiz Naseem's best friend Ahmer and ever since my marriage we have had very close relations with Hafiz Naseem, his wife Ayesha and his two children Danish and Maheen.

Hafiz Naseem is extremely kind hearted and a very caring and loyal friend always ready to help any one in need. He cannot see anyone in anguish be it friend or foe. During childhood I observed that he always handled his family with the care and maturity not expected of any teenager. He always took good care of his epileptic mother with regards to her medical and emotional needs. He is always happy to help out anyone in need. He has always been with me and my husband through all of our highs and lows helping us out in times when we needed both financial and moral support. Hafiz Naseem is one of those people who cannot bear to see anyone in pain. He has been through a lot in his life and things just seem to be getting very difficult for him with the passage of time. He grew up in a childhood filled with the added burden of taking care of his epileptic mother and she grew very much dependant upon him to will her on in her low times. He made sure he bore all the pressure since his father has a chronic heart condition. From his childhood arose a strong, mature and confident man who handled his family's darkest hour, the death of his teenage sister, with confidence and maturity slowly but surely bringing his parents and his younger brother Usman out of misery. He vowed to give his children the perfect love and a happy childhood that he couldn't receive from his parents. He established friendly relations with his son Danish and would be there for him through every achievement or failure of his life. However, his dream for a perfect family faced the first obstacle with the birth of his daughter with defects in her hips and legs due to which she couldn't walk. To give his daughter a normal childhood, Hafiz Naseem moved to the United States to make sure that his daughter could receive the treatment necessary for her condition which wasn't available in Pakistan. After undergoing surgery in America, Maheen could walk again albeit with difficulty. However Hafiz Naseem was always at her side willing her on. But now, because of his legal matters, Maheen's surgeries have had to be delayed and as far as I know him, he must be going through a lot of torment knowing that his daughter is not receiving the treatment which is required for her. Another thing which is equally disturbing is the torment Hafiz Naseem's mother is going through right now feeling helpless by not being able to do anything to protect her son, the son who was with her through often difficult life.

This is my plea to you not to give Hafiz Naseem a prison sentence. His father who has heart problems might not be able to bear it, his mother might not be able to see the son who helped her the most be confined behind bars, his wife might not be able to take care of the two children of one who has special needs who love their father so much and his daughter might not be able to have the perfect future Hafiz Naseem had envisioned for her. The children are very dependent on their father and Maheen being a special child needs special care that her father desired to provide her which might not be provided if he his sentenced.

Taniya Malik

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